Remarks

Claims 1-3, 5-14 and 16-50 are presently at issue in this pending patent application. Claim 1 has been amended to include the limitations of Claim 4, and Claim 4 has been cancelled. In addition, Claim 13 has been amended to include the limitations of Claim 15, and Claim 15 has been cancelled. No new matter has been added. Reconsideration of the pending Claims and allowance is respectfully requested in view of the following comments.

The 35 U.S.C. 112 first paragraph Claim Rejections

Claims 1-9 and 22-25 stand rejected pursuant to 35 U.S.C. 112 first paragraph as failing to comply with the written description requirement. Applicant is unable to ascertain the basis for this rejection. The office action mailed April 26, 2005 based the 35 U.S.C. 112 first paragraph rejection on the assertion that the term "sequenced" constituted new matter. The term "sequenced" does not appear in any one of Claims 1-9 and 22-25. Accordingly, Applicant respectfully requests removal of the 35 U.S.C. 112 first paragraph rejection of Claims 1-9 and 22-25.

The 35 U.S.C. 102(e) Claim Rejections

Claims 1-6, 8-25 and 27-40 stand rejected pursuant to 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,430,624 to Jamtgaard et al. (hereinafter "Jamtgaard"). Applicant respectfully traverses these rejections since Jamtgaard fails to teach each and every limitation of the Claims. "To anticipate, every element and limitation of the claimed invention must be found in a single prior art reference, arranged as in the claim." *Brown v. 3M*, 265 F.3d 1349 (Fed. Cir. 2001).

Claims 1-6 and 8-12

Applicant respectfully disagrees with the assertion of the office action mailed April 26, 2005, that Fig. 3 of Jamtgaard teaches translation of a request received from a front-end systems layer to a document object model document to represent an input message as described in

Claim 1. To the contrary, Fig. 3 and Col. 5 lines 54-66 of Jamtgaard is focused not on requests, but solely on responses, as shown in Figure 3 of Jamtgaard by the signal flow of content from a content provider to a mobile telephone. Applicant readily acknowledges that Jamtgaard teaches a plurality of devices that communicate over a network with an Internet information provider. Jamtgaard, however, also teaches that each type of wireless device is in a separate telecom system with separate gateways, proxies, etc. (Col. 5 lines 7-9) Thus, Jamtgaard fails to teach that requests are received by a front end system layer and then translated, and instead teaches that the requests are translated in separate telecom systems prior to receipt by Jamtgaard's translation server (12).

Conversely, amended Claim 1 describes receiving a request, translating a request to a document object model document to represent an input message and executing code to access data based on the translated request. Clearly, the mere mention by Jamtgaard of translation of a request with a separate telecom system does not explicitly or inherently disclose the limitations of receiving a request, translating the request to a document object model document to represent an input message and executing code to access data based on the translated request as described in Claim 1.

In the office action mailed April 26, 2005 it was asserted that Jamtgaard "inherently" teaches translation of requests due to the gateways illustrated in Fig. 2. However, Jamtgaard fails to even mention the technical details of how the gateways operate. "The fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the inherency of that result or characteristic." MPEP 2112 (IV). Probabilities or possibilities cannot be used to establish inherency. *In re Robertson*, 169 F.3d 743 (Fed. Cir. 1999). Clearly, a response from a content server and a request are two entirely different messages (or documents), having significantly different content, format etc., and the request described in Claim 1 is not identically or inherently taught by Jamtgaard.

Claims 13-20

Applicant again respectfully asserts that a response is not inherently a request. Thus, assertions in the office action mailed April 26, 2005 that Jamtgaard teaches each and every limitation described in Claim 13 are respectfully traversed. As previously discussed, Jamtgaard teaches only that separate telecom systems are translating requests from wireless devices and providing the translated requests to content servers. (see also Col. 6 lines 59-64) Claim 13, on the other hand, describes identifying the value of a request name parameter from a request initiated with a delivery technology and initiating the retrieval of data based on the request name parameter.

While Applicant agrees that requests may contain parameters, Claim 13 provides a specific parameter described as a request name parameter that is used to set a root element to a message name. (see Applicant's specification at least page 17, lines 18-31) Jamtgaard does not mention parameters in requests, and therefore cannot possibly teach that a request includes a value that is a request name parameter used to set a root element to a message name as described in Claim 13. Further, Applicant agrees that a data structure tree is taught by Jamtgaard in Fig. 17; however, Jamtgaard fails to teach that the data structure tree has any relevance to retrieval of data based on a request name parameter as also described in Claim 13, and instead teaches organization of previously retrieved data prior to transmittal to a requesting device.

Claims 21-25 and 27-33

Applicant respectfully asserts that Applicant's arguments filed on December 22, 2004 do not "boil down" to a single argument. Rather, Applicant has specifically pointed out those limitations present in Claim 21 that are not taught by Jamtgaard. Specifically, Jamtgaard does not teach a translation of a request to a first document object model document and reading data into a second document object model as described in Claim 21. Conversely, Jamtgaard only teaches a single document object model related to a response. Jamtgaard also fails to teach selectively limiting the data structure of the first document object model document and the

second document object model document as is also provided in Claim 21. In sharp contrast, the entire scope and purpose taught by Jamtgaard is to represent content of an entire web page with a tree structure, not limit the data structure as described in Claim 21. Further, since Jamtgaard does not teach first and second document object model documents, Jamtgaard also does not teach an ApiService class that reads data into both the first and the second document object model documents as also described in Claim 21.

Claims 34-40

Again, Applicant respectfully asserts that Applicant's arguments do not "boil down" to a single argument as asserted in the office action mailed April 26, 2005. Rather, Applicant has identified specific limitations in Claim 34 that are not taught by Jamtgaard. Specifically, the cited portions of Jamtgaard refer to only responses and not requests. As previously discussed, responses are completely different in structure and function from requests. In addition, Jamtgaard does not teach a server operable to convert both a request and a response to an input message and an output message, respectively, in a predetermined extensible markup language format as described in Claim 34. In contrast, Jamtgaard simply teaches that a different dedicated web server is required to handle input messages transmitted from different devices in different formats (Col. 1 lines 60-67, Col. 5 lines 6-9, and Col. 6 lines 59-64), and responses are handled by still another server (translation server 12). Not only does Jamtgaard fail to teach how the requests are handled, but also Jamtgaard clearly teaches that the requests and responses are not handled by the same server computer as described in Claim 35. Further, the office action mailed April 26, 2005 asserts that Jamtgaard "alludes" to instructions to retrieve data as a function of request parameters as described in Claim 34. However, the cookies described by Jamtgaard are part of the web content retrieved in response to a request, not request parameters included in an input message as described in Claim 34.

For at least the foregoing reasons, Jamtgaard does not explicitly or inherently teach each and every limitation described in Claims 1-6, 8-25 and 27-40. Applicant therefore respectfully requests withdrawal of the 35 U.S.C. 102(e) rejections of Claims 1-6, 8-25 and 27-40.

The 35 U.S.C. 103(a) Claim Rejections

Claims 7 and 26 stand rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of Jamtgaard and further in view of *Take and in-depth look at the Java Reflection API*, Chuck McManis, Java World, p. 1-11, September 1997 (hereinafter "McManis"). In addition, Claims 41-50 stand rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of Jamtgaard and *Java Examples in a Nutshell: A tutorial Companion to Java in a Nutshell*, David Flanagan, p. 20-26 O'Reilly & Associates, Inc. 1997 (hereinafter "Flanagan").

Claims 41-50

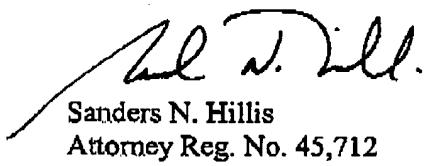
In addition to the previously discussed reasons regarding Jamtgaard's teachings related to translations of a request to an input message represented with a document object model (not a response), Claim 41 also describes a Message class and a Field class operable to restrict manipulation of the document object model document. Applicant agrees with the definition of a wrapper as defined on page 575 of Microsoft Computer Dictionary fifth edition (2002). In addition, Applicant readily agrees that Flanagan is describing a class representing complex numbers. However, what both Jamtgaard and Flanagan fail to teach, suggest, or disclose is restriction of manipulation of a document object model document as provided in Claim 41. As described on at least page 13 lines 4-15 of Applicant's specification, restriction of manipulation reduces coding complexity and streamlines processing for input and output messages. Flanagan, on the other hand, teaches encapsulation by declaring fields within a class private to make them inaccessible from outside the class, and defines methods within the class to access the information in the identified fields. Clearly, Flanagan does not teach, suggest, or disclose restriction of manipulation of a document object model document as described in Claim 41. In addition, Applicant respectfully asserts that hiding implementation details as taught by Flanagan

allows implementations to be changed without affecting users, but has nothing to do with restricting manipulation of a document object model document as described in Claim 41.

For at least the previously discussed reasons, all of the claim features described by Claim 41 are not taught or suggested by the cited combination of the prior art. Thus, a *prima facie* case of obviousness has not been established for Claim 41. Claims 42-50 depend from independent Claim 41, and therefore a *prima facie* case of obviousness has also not been established for those Claims. Applicant respectfully requests removal of the 35 U.S.C. §103(a) rejection of Claims 41-50.

The application is believed to now be in condition for allowance, which is respectfully requested. Should the Examiner deem a telephone conference to be beneficial in expediting examination and/or allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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